## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE KINGDOM OF DENMARK (SKAT) TAX REFUND SCHEME LITIGATION

This document relates to: 18-cv-10100

MASTER DOCKET

18-md-2865 (LAK)

## NOTICE OF NEWSONG FELLOWSHIP CHURCH 401(k) PLAN AND ALEXANDER JAMIE MITCHELL III'S MOTION TO DISMISS COMPLAINT

**PLEASE TAKE NOTICE THAT**, upon the accompanying memorandum of law and declaration of John C. Blessington, Defendants Newsong Fellowship Church 401(k) Plan and Alexander Jamie Mitchell III named in the above-captioned consolidated action (18-md-02865) and the related action (18-cv-10100), hereby move this Court for an order dismissing the complaint with prejudice pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) and for such other, further, or different relief as the Court deems just and proper.

December 6, 2018

NEWSONG FELLOWSHIP CHURCH 401(k) PLAN and ALEXANDER JAMIE MITCHELL III

/s/ John C. Blessington

John C. Blessington (pro hac vice) john.blessington@klgates.com
Brandon R. Dillman (pro hac vice) brandon.dillman@klgates.com
K&L GATES LLP
State Street Financial Center
One Lincoln Street
Boston, MA 02111
T: 617.951.9185
F: 617.261.3175

Attorneys for Newsong Fellowship Church 401(k) Plan and Alexander Jamie Mitchell III

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and copies will be sent to those indicated as nonregistered participants on December 6, 2018.

/s/ John C. Blessington
John C. Blessington